

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
)
v.) Criminal No.: 2:15-cr-00256-CB
)
)
WILLIAM J. CHAFFIN, JR.) Judge Cathy Bissoon

MOTION FOR PRE-PLEA PRESENTENCE INVESTIGATION REPORT

AND NOW, comes the Defendant, William J. Chaffin, Jr., by and through his attorney, Joseph M. Yablonski, Esquire, and respectfully files this Motion for Pre-Plea Presentence Investigation Report as follows:

1. Defendant, William J. Chaffin, Jr. was charged in a multiple count indictment with four counts of possession with intent to distribute cocaine, in violation of Title 21, United States Code 841(a)(1) and 841(b)(1)(C) and one count of possession of firearms and ammunition in violation of Title 18, United States Code, Section 922(g)(1). He was arraigned on December, 11, 2015.

2. Defense counsel and counsel for the government have engaged in some preliminary plea negotiations.

3. Although defense counsel has reviewed and conducted some research regarding Defendant's criminal history, it is submitted that a presentence investigation report, limited to Defendant's criminal history, would be of valuable assistance to Defendant in considering a plea agreement. Defendant's Consent to Submittal and

Disclosure of a Limited Presentence Investigation Report and Waiver of Federal Rule of Criminal Procedure 32(e)(1) is attached hereto.

4. Assistant United States Attorney Barbara Doolittle does not oppose the relief requested herein.

WHEREFORE, for the foregoing reasons, Defendant, William J. Chaffin, Jr., respectfully requests that this Honorable Court enter an Order directing the Probation Office to conduct an investigation and prepare a presentence investigation report limited to Defendant's criminal history.

Respectfully submitted,

/s/ Joseph M. Yablonski
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